## BLM BURLEY OPERATIONS SITE (PWS # 5160005) SOURCE WATER ASSESSMENT FINAL REPORT

### **April 17, 2003**



# State of Idaho Department of Environmental Quality

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### **Executive Summary**

Under the Federal Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency (EPA) to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the Act. The Idaho Department of Environmental Quality (DEQ) is completing the assessments for all Idaho public drinking water systems.

The assessment for your particular drinking water source is based on a land use inventory within a 1,000-foot radius of your drinking water source, sensitivity factors associated with the source, and characteristics associated with either your aquifer or watershed in which you live.

The delineation process establishes the physical area around a drinking water source that will become the focal point of the assessment. The arbitrary-fixed radius method was used to delineate transient water systems (Idaho Source Water Assessment Plan, pg. 15 and E5-E6) by drawing a 1000-foot radius circle around the drinking water sources. This distance is the same for every transient drinking water source. It is impractical to develop more intensive delineations for these systems because of limited resources for protection and lack of jurisdiction over land use outside property boundaries.

This report, Source Water Assessment for the BLM Burley Operations Site: Public Water System (PWS) #5160005 describes the public drinking water system, the associated potential contaminant sources located within a 1,000-foot boundary around the drinking water source, and the susceptibility (risk) that may be associated with any associated potential contaminants. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this system. The results should not be used as an absolute measure of risk and is not intended to undermine the confidence in your water system.

Final susceptibility scores are derived from equally weighing system construction scores, hydrologic sensitivity scores, and potential contaminant/land use scores. Therefore, a low rating in one or two categories coupled with a higher rating in other categories results in a final rating of low, moderate, or high susceptibility. With the potential contaminants associated with most urban and heavily agricultural areas, the best score a well can get is moderate. Potential Contaminants/Land Uses are divided into four categories, inorganic contaminants (IOCs, e.g. nitrates, arsenic), volatile organic contaminants (VOCs, e.g. petroleum products), synthetic organic contaminants (SOCs, e.g. pesticides), and microbial contaminants (e.g. bacteria). As different wells can be subject to various contamination settings, separate scores are given for each type of contaminant.

The *BLM Burley Operations Site* drinking water system consists of one ground water well that serves approximately 25 people through three connections. The system rated highly susceptible to IOCs, VOCs, SOCs, and microbial contaminants due to the proximity of an irrigation canal that runs within 20 feet of the wellhead. If the canal were diverted to an area of 50 feet or greater from the wellhead, the overall susceptibility would be reduced from high to moderate.

Though nitrate currently is not above the maximum contaminant level (MCL) of 10 milligrams per liter, it has been detected in the well water at levels ranging from 5.89 mg/L in 1993 levels greater than one-half the MCL. EPA requires reporting in the Consumer Confidence Report (CCR) if concentrations of regulated compounds are greater than half their MCL. Further information and health side effects can be researched at <a href="http://www.epa.gov/safewater/ccr1.html">http://www.epa.gov/safewater/ccr1.html</a>.

The initial computer generated contaminant source inventory conducted by DEQ identified forestry services and a site regulated under the Resource Conservation and Recovery Act as potential contaminant sources within the 1,000-foot boundary. The Geographic Information System (GIS) map shows that the delineation includes Highway 27 and a canal as potential contaminant sources. Additionally, the 2000 Ground Water Under Direct Influence (GWUDI) field survey indicates that a drainfield is within 200 feet of the wellhead and an irrigation canal runs within 20 feet of the wellhead. A radius of 50 feet around the wellhead is known as the 1A zone or sanitary setback. Drinking water sources that have contaminants in this zone are considered highly vulnerable to contamination. All of these potential contaminant sources can contribute contaminants to the aquifer in the event of an accidental spill or release. The table below lists these contaminants. A copy of the susceptibility analysis worksheet for the well for your system along with a map showing any potential contaminant sources is included with this summary.

Table 1. BLM Burley Operations Site, Well #1, Potential Contaminant Inventory

Site #	Source Description <sup>1</sup>	Source of Information	Potential Contaminants <sup>2</sup>				
1	Forestry Services- Government	Database Search	IOC, VOC, SOC, Microbials				
2	RCRA Site	GIS Map	IOC, VOC, SOC				
	Highway 27	GIS Map	IOC, VOC, SOC, Microbials				
	Canal	GIS Map	IOC, VOC, SOC, Microbials				
	Drainfield	2000 GWUDI	IOC, Microbials				
	Irrigation Ditch	2000 GWUDI	IOC, VOC, SOC, Microbials				

<sup>&</sup>lt;sup>2</sup> IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

## **Susceptibility Analysis**

The susceptibility of each well to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. The following summaries describe the rationale for the susceptibility ranking.

### **Hydrologic Sensitivity**

The hydrologic sensitivity of a well is dependent upon four factors: the surface soil composition, the material in the vadose zone (between the land surface and the water table), the depth to first ground water, and the presence of a 50-foot thick fine-grained zone (aquitard) above the producing zone of the well. Slowly draining soils such as silt and clay typically are more protective of ground water than coarse-grained soils such as sand and gravel. Similarly, fine-grained sediments in the subsurface and a water depth of more than 300 feet protect the ground water from contamination.

The hydrologic sensitivity was low for the BLM Burley Operations Site well. The score was partly based upon poor to moderately drained soil classes as defined by the National Resource Conservation Service (NRCS). Poor to moderately draining soils tend to impede the migration of contaminants to the aquifer. The well log indicates that the vadose zone is predominantly sandy clay and several thick clay layers create an aquitard above the producing zone of the well. However, first water is found at a shallow depth between 47 and 51 feet below ground surface (bgs).

### **System Construction**

Well construction directly affects the ability of the well to protect the aquifer from contaminants. System construction scores are reduced when information shows that potential contaminants will have a more difficult time reaching the intake of the well. Lower scores imply a system is less vulnerable to contamination. For example, if the well casing and annular seal both extend into a low permeability unit, then the possibility of contamination is reduced and the system construction score goes down. If the highest production interval is more than 100 feet below the water table, then the system is considered to have better buffering capacity. If the wellhead and surface seal are maintained to standards and the well casing is vented, as outlined in sanitary surveys, then contamination down the well bore is less likely. If the well is protected from surface flooding and is outside the 100-year floodplain, then contamination from surface events is reduced.

The BLM Burley Operations Site well was drilled in 1980 to a depth of 215 feet bgs. It has a 0.279-inch thick, ten-inch diameter casing set from 2 feet above ground surface to 163 bgs into brown clay. The annular seal extends to a depth of 18 feet bgs into sandy clay. The highest production zone is between 167 feet and 215 feet bgs and the static water level is found at 167 feet bgs.

System construction for the well was rated moderately vulnerable to contamination. The 2000 sanitary survey indicates that wellhead and surface seals are maintained to standards and that the well is properly protected from surface flooding. However, the well lacks a casing vent. The purpose of the vent is to vent the space between the casing and the column and prevent a vacuum from forming when the well turns on and draws down the water table. A vacuum could draw in contamination through joints or leaks in the casing or cause the well to slough. The well is located outside a 100-year floodplain and the casing and annular seal do extend to low permeable units of clay.

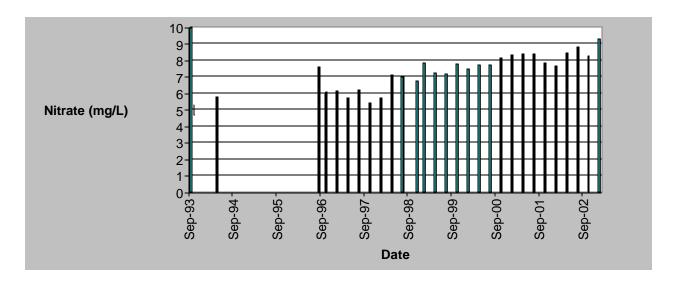
The Idaho Department of Water Resources *Well Construction Standards Rules* (1993) require all Public Water Systems (PWSs) to follow DEQ standards. IDAPA 58.01.08.550 requires that PWSs follow the *Recommended Standards for Water Works* (1997) during construction. Some of the requirements include casing thickness, well tests, and depth and formation type that the surface seal must be installed into. Table 1 of the *Recommended Standards for Water Works* (1997) lists the required steel casing thickness for various diameter wells. Ten-inch diameter wells require a casing thickness of 0.365 of an inch. Well tests are required at the design pumping rate for 24 hours or until stabilized drawdown has continued for at least six hours when pumping at 1.5 times the design pumping rate. Though the well may have met standards at the time of construction, current construction standards are stricter.

#### **Potential Contaminant Source and Land Use**

The well rated high for IOCs (e.g., arsenic, nitrate), VOCs (e.g., petroleum products), and SOCs (e.g., pesticides), and moderate for microbial contaminants (e.g., bacteria). Total coliform bacteria were detected repeatedly in July 1995 and in February 1998 in the distribution system. However, no further detections have occurred. No VOCs or SOCs have been detected in the system. However, the irrigated agricultural land use of the area has lead to county nitrogen fertilizer use, county herbicide use, and total county ag-chemical use being rated as "high" for Cassia County. The irrigated agricultural land that surrounds the area of the well contributed greatly to the land use scores.

The IOC nitrate was detected at levels greater than one-half the MCL of 10 mg/L from 1993 to 2003. See the chart below. EPA requires reporting in the Consumer Confidence Report (CCR) if concentrations of regulated compounds are greater than half their MCL. Further information and health side effects can be researched at <a href="http://www.epa.gov/safewater/ccr1.html">http://www.epa.gov/safewater/ccr1.html</a>.

#### Nitrate Levels in the BLM Burley Operations Site Well



Additionally, the well delineation crosses a nitrate priority area and an organic contaminant priority area of the pesticide atrazine. A nitrate priority area is an area where greater than 25% of the wells/springs show nitrate values greater than 5 milligrams per liter (mg/L). An organic contaminant priority area is a region where greater than 25% of the wells in the area show levels greater than 1% of the primary standard or other health standards.

#### **Final Susceptibility Rating**

An IOC detection above a drinking water standard MCL, any detection of a VOC or SOC, or a confirmed detection of total coliform bacteria or fecal coliform bacteria at the wellhead will automatically give a high susceptibility rating to a well, despite the land use of the area, because a pathway for contamination already exists. Additionally, having potential contaminant sources within 50 feet of the wellhead will give an automatic high susceptibility rating. In this case, the 2000 GWUDI field survey indicates that there is an irrigation canal that runs within 20 feet of the wellhead, resulting in automatic high susceptibility scores for all potential contaminant categories. Having multiple potential contaminant sources within the 1000-foot radius of the well and much agricultural land contribute greatly to the overall ranking. In terms of total susceptibility, the well rated high to IOCs, VOCs, SOCs, and microbial contaminants. If the canal is diverted to an area greater than 50 feet from the wellhead or if the canal is lined with an impermeable liner, the overall susceptibility would be reduced from high to moderate.

### **Options for Drinking Water Protection**

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

For BLM Burley Operations Site, drinking water protection activities should focus on correcting any deficiencies outlined in the sanitary survey (an inspection conducted every five years with the purpose of determining the physical condition of a water system's components and its capacity). BLM Burley Operations Site needs to divert the irrigation canal to an area at least 50 feet away from the wellhead or the canal needs to be lined to meet the setback requirements. Additionally, a casing needs to be installed on the wellhead to prevent contamination. Partnerships with state and local agencies and industry groups should be established and are critical to success. You may want to establish a dialog with the relevant state and local agencies related to wellhead protection. Drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus of any drinking water protection plan because the delineations show large areas of urban land use. There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the EPA. For areas where transportation corridors transect the delineation, the Department of Transportation should be included in protection activities. Drinking water protection activities for agriculture should be coordinated with the Idaho State Department of Agriculture, the Soil Conservation Commission, the local Soil Conservation District, and the Natural Resources Conservation Service.

#### Assistance

Public water suppliers and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

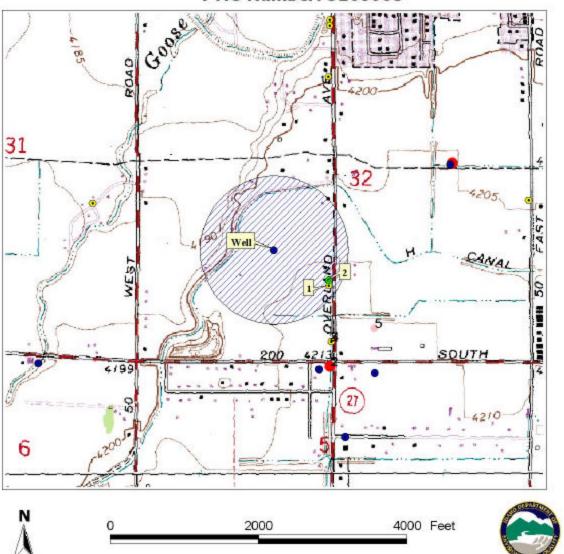
Twin Falls Regional DEQ Office (208) 736-2190

State DEQ Office (208) 373-0502

Website: http://www.deq.state.id.us

Water suppliers serving fewer than 10,000 persons may contact Melinda Harper (<u>mlharper@idahoruralwater.com</u>), Idaho Rural Water Association, at (208) 343-7001 for assistance with drinking water protection (formerly wellhead protection) strategies.

## BLM Burley Oerations Site: Well PWS Number: 5160005





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#### POTENTIAL CONTAMINANT INVENTORY LIST OF ACRONYMS AND DEFINITIONS

**AST** (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

<u>Business Mailing List</u> – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

<u>CERCLIS</u> – This includes sites considered for listing under the <u>Comprehensive Environmental Response Compensation and Liability Act (CERCLA)</u>. CERCLA, more commonly known as Superfund is designed to clean up hazardous waste sites that are on the national priority list (NPL).

<u>Cyanide Site</u> – DEQ permitted and known historical sites/facilities using cyanide.

<u>Dairy</u> – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

<u>Deep Injection Well</u> – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (IDEQ) during the primary contaminant inventory.

<u>Floodplain</u> – This is a coverage of the 100year floodplains.

<u>Group 1 Sites</u> – These are sites that show elevated levels of contaminants and are not within the priority one areas

<u>Inorganic Priority Area</u> – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

<u>Landfill</u> – Areas of open and closed municipal and non-municipal landfills.

<u>LUST (Leaking Underground Storage Tank)</u> – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

<u>Mines and Quarries</u> – Mines and quarries permitted through the Idaho Department of Lands.)

<u>Nitrate Priority Area</u> – Area where greater than 25% of wells/springs show nitrate values above 5 mg/l.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

<u>Organic Priority Areas</u> – These are any areas where greater than 25% of wells/springs show levels greater than 1% of the primary standard or other health standards.

Recharge Point – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under <u>Resource</u> <u>Conservation Recovery Act (RCRA)</u>. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

<u>UST (Underground Storage Tank)</u> – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

<u>Wastewater Land Applications Sites</u> – These are areas where the land application of municipal or industrial wastewater is permitted by IDEQ.

<u>Wellheads</u> – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

**NOTE:** Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.

#### **References Cited**

- Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, 1997. "Recommended Standards for Water Works."
- Idaho Department of Environmental Quality, 1997. Design Standards for Public Drinking Water Systems. IDAPA 58.01.08.550.01.
- Idaho Department of Water Resources, 1993. *Administrative Rules of the Idaho Water Resource Board: Well Construction Standards Rules*. IDAPA 37.03.09.
- Idaho Division of Environmental Quality, 1999, Idaho Source Water Assessment Plan, October.
- Idaho Department of Environmental Quality, 2000. Drinking Water Supply Report for BLM-Burley Operations Site PWS #5160005.
- Idaho Department of Environmental Quality, 2000. Ground Water Under Direct Influence Field Survey for BLM-Burley Operations Site PWS #5160005.
- State Drinking Water Information System (SDWIS). IDEQ. 2003.

### **Susceptibility Analysis Formulas**

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.27)
- 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.375)

Final Susceptibility Scoring:

- 0 5 Low Susceptibility
- 6 12 Moderate Susceptibility
- ≥ 13 High Susceptibility

Public Water System Name :

BLM BURLEY SITE Well# : WELL #1 Public Water System Number 55160005 2/24/03 11:50:38 AM 1. System Construction Drill Date UNKNOWN Driller Log Available NO Sanitary Survey (if yes, indicate date of last survey) YES Well meets IDWR construction standards 1 Wellhead and surface seal maintained Casing and annular seal extend to low permeability unit NO 2 Highest production 100 feet below static water level NO 1 Well located outside the 100 year flood plain 0 Total System Construction Score 5 2. Hydrologic Sensitivity Soils are poorly to moderately drained YES NO Vadose zone composed of gravel, fractured rock or unknown 1 1 Depth to first water > 300 feet Aquitard present with > 50 feet cumulative thickness NO 2 Total Hydrologic Score

3. Potential Contaminant / Land Use - ZONE 1A		IOC Score	VOC Score	SOC Score	Microbial Score
Land Use Zone 1A	URBAN/COMMERCIAL	2	2	2	2
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	YES	YES	YES	YES	YES
Total Potential Cont	aminant Source/Land Use Score - Zone 1A	2	2	2	2
Potential Contaminant / Land Use - ZONE 1B					
Contaminant sources present (Number of Sources)	YES	2	2	2	2
(Score = # Sources X 2 ) 8 Points Maximum		4	4	4	4
Sources of Class II or III leacheable contaminants or	YES	2	2	2	
4 Points Maximum		2	2	2	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B	Less Than 25% Agricultural Land	0	0	0	0
Total Potential Contam	inant Source / Land Use Score - Zone 1B	6	6	6 	4
Cumulative Potential Contaminant / Land Use Score			8	8 	6 
Final Susceptibility Source Score			11	11	11
5. Final Well Ranking		High	High	High	 High